

Message

From: Yannayon, Laura [Yannayon.Laura@epa.gov]
Sent: 5/21/2019 11:26:46 PM
To: Sutkus, Carol@ARB [carol.sutkus@arb.ca.gov]; Lo, Doris [Lo.Doris@epa.gov]
CC: Fideldy, Ariel@ARB [afideldy@arb.ca.gov]; Parent, Stephanie@ARB [stephanie.parent@arb.ca.gov]
Subject: RE: YSAQMD Rule Updates

Hi Carol,

This is probably my fault. I was speaking with the District about the option to do a conditional approval or a LA/LD, and listed the 2 deficiencies for them to review. I did not send a formal, or really informal comment letter. Instead of moving forward with either of these options, the District decided it would just be quicker to fix the rule now and made the revisions to address the issues I had raised with them.

I'll forward the email I sent to Paul with our disapproval issues. I'm happy to cc ARB when I send comments (usually mark ups of their draft rules in track changes, rather than formal comments) and when I send formal comments.

Laura

From: Sutkus, Carol@ARB <carol.sutkus@arb.ca.gov>
Sent: Tuesday, May 21, 2019 4:11 PM
To: Yannayon, Laura <Yannayon.Laura@epa.gov>; Lo, Doris <Lo.Doris@epa.gov>
Cc: Fideldy, Ariel@ARB <afideldy@arb.ca.gov>; Parent, Stephanie@ARB <stephanie.parent@arb.ca.gov>
Subject: RE: YSAQMD Rule Updates

Hi Laura and Doris,

This brought up an interesting point. The quick turnaround for this rule was not on our radar and we did not have the opportunity to review this rule change. WE'll send a reminder to the District, as well. But, I seem to remember that way back, Andy Steckel would copy us on EPA's comments on district rules. That way we are able to circulate those changes and track EPA's requests.

Would it be possible for you to include us on your comments on district rules?

Thank you,
Carol



Carol Sutkus
Manager, South Coast Air Quality Planning Section
Air Quality Planning Branch
Air Quality Planning and Science Division
California Air Resources Board
916.322.1229
Carol.Sutkus@arb.ca.gov

From: Yannayon, Laura <Yannayon.Laura@epa.gov>
Sent: Tuesday, May 21, 2019 1:39 PM
To: Parent, Stephanie@ARB <stephanie.parent@arb.ca.gov>; Yolo Solano <phensleigh@ysaqmd.org>
Cc: Ben Beattie <BBeattie@ysaqmd.org>; Anna Champe <AChampe@ysaqmd.org>; Sutkus, Carol@ARB <carol.sutkus@arb.ca.gov>; Fideldy, Ariel@ARB <afideldy@arb.ca.gov>
Subject: RE: YSAQMD Rule Updates

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Yes, your link is to the correct NOI.

CBD is incorrect about a submittal not being made, as you noted, we sent a complete letter on 5/6/18. However, because this submittal was subject to a Finding of Failure to Submit (FFS) action, there is not only a submittal deadline, which was met, but a deadline for EPA to either take an action fully approving the submittal, or implement a FIP to fill the gap in the SIP. If we had proceeded with the current, but not fully approvable version of the rule, it would not have relieved EPA of the FIP obligation, because the approval was not a full approval.

Laura

From: Parent, Stephanie@ARB <stephanie.parent@arb.ca.gov>
Sent: Tuesday, May 21, 2019 1:34 PM
To: Yannayon, Laura <Yannayon.Laura@epa.gov>; Yolo Solano <phensleigh@ysaqmd.org>
Cc: Ben Beattie <BBeattie@ysaqmd.org>; Anna Champe <ACHampe@ysaqmd.org>; Sutkus, Carol@ARB <carol.sutkus@arb.ca.gov>; Fideldy, Ariel@ARB <afideldy@arb.ca.gov>
Subject: RE: YSAQMD Rule Updates

Also, is this the NOI you are referring to?

https://www.biologicaldiversity.org/programs/environmental_health/pdfs/CA-AZ-PM-O3-NOI.pdf

I see there was a completeness letter for this on 5/16/18.

Steph



Stephanie Parent,
Air Pollution Specialist
Air Quality Planning and Science Division | South Coast Section

CARB-Orators, Toastmasters, www.toastmasters.org

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The climate change challenge facing us is real. For a list of simple actions you can take to reduce your environmental impact, visit www.CoolCalifornia.org.

From: Yannayon, Laura <Yannayon.Laura@epa.gov>
Sent: Tuesday, May 21, 2019 12:52 PM
To: Yolo Solano <phensleigh@ysaqmd.org>; Parent, Stephanie@ARB <stephanie.parent@arb.ca.gov>
Cc: Ben Beattie <BBeattie@ysaqmd.org>; Anna Champe <ACHampe@ysaqmd.org>; Sutkus, Carol@ARB <carol.sutkus@arb.ca.gov>; Fideldy, Ariel@ARB <afideldy@arb.ca.gov>
Subject: RE: YSAQMD Rule Updates

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Hi Stephanie,

Paul is correct. To avoid a lawsuit regarding Rule 3.25 (EPA's failure to approve or implement a FIP), EPA would like to receive the submittal ASAP. (Next 2 weeks would be great!) We have drafted our rulemaking documents based on the version of the rule Y/S sent us that they were proposing for approval. We are now just waiting for the actual submittal to drop in the submittal dates.

Thanks,
Laura

From: Paul Hensleigh <PHensleigh@ysaqmd.org>

Sent: Tuesday, May 21, 2019 12:46 PM

To: Parent, Stephanie@ARB <stephanie.parent@arb.ca.gov>

Cc: Ben Beattie <BBeattie@ysaqmd.org>; Anna Champe <AChampe@ysaqmd.org>; Sutkus, Carol@ARB <carol.sutkus@arb.ca.gov>; Fideldy, Ariel@ARB <afideldy@arb.ca.gov>; Yannayon, Laura <Yannayon.Laura@epa.gov>

Subject: RE: YSAQMD Rule Updates

Hi Stephanie,

The Rule 3.25 is a bit of a priority, because EPA has received a Notice of Intent to Sue, listing their failure to implement a FIP for the lack of a SIP approved NNSR PM2.5 program in our District. I've copied Laura Yannayon on this e-mail and she can tell us whether July is fine, or whether they want it sooner. I've attached the Rule 3.25 submittal documents here.

For Rule 2.27, July would be fine. Ben will be submitting those documents separately.

Thanks,
Paul Hensleigh
(530) 757-3665

From: Parent, Stephanie@ARB [mailto:stephanie.parent@arb.ca.gov]

Sent: Monday, May 20, 2019 3:34 PM

To: Paul Hensleigh; Fideldy, Ariel@ARB

Cc: Ben Beattie; Anna Champe; Sutkus, Carol@ARB

Subject: RE: YSAQMD Rule Updates

Hi Paul,

Thank you for the updated rules. I will post them to the District Rules Database (DRDB) website.

As an FYI, I serve as the lead staff person to process district rules now. Ariel serves as the back-up if I am out of the office. Also, please include Carol Sutkus, our supervisor, on emails as well. For the SIP submittals, email submission is great and there is no need to also mail a hard copy via the postal mail. Lastly, when you email the materials, please let me know if there is any rush or if the rules can be sent to US EPA with our second quarter package, which will be sent to Region 9 in July.

Sincerely,
Stephanie

Stephanie Parent,
Air Pollution Specialist
Air Quality Planning and Science Division | South Coast Section

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The climate change challenge facing us is real. For a list of simple actions you can take to reduce your environmental impact, visit www.CoolCalifornia.org.

If you would like to give us feedback on our customer service, please complete the [customer satisfaction survey](#).

From: Paul Hensleigh <PHensleigh@ysaqmd.org>

Sent: Monday, May 20, 2019 3:17 PM

To: Fideldy, Ariel@ARB <afideldy@arb.ca.gov>; Parent, Stephanie@ARB <stephanie.parent@arb.ca.gov>

Cc: Ben Beattie <BBeattie@ysaqmd.org>; Anna Champe <AChampe@ysaqmd.org>

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Ariel,

Please post the attached 3 rules to ARB's webpage for Yolo-Solano's Rules:

- Rule 2.27 LARGE BOILERS
- Rule 2.45 BOILERS
- Rule 3.25 RULE 3.25 FEDERAL NEW SOURCE REVIEW FOR NEW AND MODIFIED MAJOR PM2.5 SOURCES

We will be working on SIP submittal forms for Rules 2.27 and 3.25.

Thanks,
Paul Hensleigh
(530) 757-3665